

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

ROBERT LEWIS JR., *on behalf of
himself and others similarly situated*,

Plaintiff,

v.

CVS PHARMACY, INC.,

Defendants.

CASE NO.: 25-CV-3763-SEG

**CONSENT MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendant CVS Pharmacy, Inc. (“CVS”), by and through its counsel of record, with the consent of Plaintiff Robert Lewis Jr. (“Lewis”), respectfully requests an extension of time up to and including November 10, 2025 to respond to the Complaint. In support of this request, CVS states as follows:

1. Plaintiff initiated this action against CVS Health Corporation on July 7, 2025. (Dkt. 1.)
2. On August 22, 2025, the Parties agreed to substitute CVS Pharmacy, Inc. as the defendant, which then waived service, setting a response deadline of October 20, 2025. (Dkt. 13, 14.)

3. Under Fed. R. Civ. P. 6, the Court may, for good cause, extend the time by which a party must act within a specified time.

4. The Parties have recently undertaken informal discussions regarding this case and seek additional time to facilitate those discussions prior to CVS's responsive pleading (which CVS anticipates will be a Motion to Dismiss).

5. Counsel for Lewis does not oppose an extension request of 21 days up to and including November 10, 2025 for CVS to answer or otherwise respond to the Complaint. No party will thus be prejudiced by the requested extension.

6. CVS files this first motion for extension in good faith and not for purposes of delay.

Accordingly, CVS respectfully requests that this Court enter an order granting CVS an extension of 21 days, up to and including November 10, 2025, to answer or otherwise respond to the Complaint.

Dated: October 16, 2025.

Respectfully submitted,

/s/ Parks K. Stone

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CERTIFICATE OF SERVICE

This is to certify that I have this day served the foregoing **Motion** by way of CM/ECF to all counsel of record.

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Dated: October 16, 2025.

**WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER, LLP**

/s/ Parks K. Stone
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